

EXHIBIT E

STIM & WARMUTH, P.C.
2 Eighth Street
Farmingville, NY 11738
Telephone: 631-732-2000
Facsimile: 631-732-2662
Paula J. Warmuth
Glenn P. Warmuth

Attorneys for Defendant

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SECURITIES INVESTOR PROTECTION
CORPORATION,

Adv. Proc. No.
08-01789 (SMB)

Plaintiff-Applicant,

SIPA LIQUIDATION

v.

(Substantively
Consolidated)

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

-----X
In Re:

BERNARD L. MADOFF,

Debtor.

-----X
IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff
Investment Securities LLC,

Adv. Proc. No.
10-04947 (SMB)

Plaintiff,

v.

MARJORIE MOST,

Defendant.

-----X
most-134

DEFENDANT'S RESPONSE TO REQUESTS FOR ADMISSION

The defendant, Marjorie Most, for her response to the requests for admission dated July 10, 2012 served by the plaintiff, states as follows:

Request No. 1. Admit that You received each of the Two year Transfer(s) set forth on Exhibit B to the Complaint, on each of the corresponding dates set forth on Exhibit B to the complaint, for BLMIS account number 1ZA781.

Response: Denies except admits that Marjorie Most received funds from her BLMIS brokerage account between December 11, 2006 and December 11, 2008 on or about the dates and in the amounts set forth in Exhibit B to the amended complaint except that Marjorie Most has been unable to verify the alleged withdrawal on January 17, 2008 in the amount of \$300,000 because plaintiff did not provide page two of the January 31, 2008 BLMIS statement.

Request No. 2. As to each of the Two Year Transfer(s), admit that You were the initial transferee, within the meaning of 11 U.S.C. § 550(a).

Response: Denies except admits that Marjorie Most withdrew funds from her brokerage account with BLMIS between December 11, 2006 and December 11, 2008 on or about the dates

and in the amounts set forth in Exhibit B to the amended complaint.

Request No. 3. As to each of the Two Year Transfer(s), admit that You were the immediate or mediate transferee of an initial transferee, within the meaning of 11 U.S.C. § 550(a).

Response: Denies except admits that Marjorie Most withdrew funds from her brokerage account with BLMIS between December 11, 2006 and December 11, 2008 on or about the dates and in the amounts set forth in Exhibit B to the amended complaint.

Request No. 4. Admit that You have not returned any of the Two Year Transfer(s) to the Trustee.

Response: Denies except admits that Marjorie Most has not returned any funds to the Trustee that Marjorie Most withdrew from her brokerage account with BLMIS between December 11, 2006 and December 11, 2008.

Request No. 5. Admit that You received each of the Six Year Transfer(s) set forth on Exhibit B to the Complaint, on each of the corresponding dates set forth on Exhibit B to the Complaint, for BLMIS account number 1ZA781.

Response: Object as not relevant - 6 year claims dismissed.

Request No. 6. As to each of the Six Year Transfer(s),
admit that You were the initial transferee within the meaning
of 11 U.S.C. § 550(a).

Response: Object as not relevant - 6 year claims
dismissed.

Request No. 7. As to each of the Six Year Transfer(s),
admit that You were the immediate or mediate transferee of an
initial transferee, within the meaning of 11 U.S.C. § 550(a).

Response: Object as not relevant - 6 year claims
dismissed.

Request No. 8. Admit that You have not returned any of
the Six Year Transfer(s) to the Trustee.

Response: Object as not relevant - 6 year claims
dismissed.

Dated: Farmingville, NY
January 29, 2014

STIM & WARMUTH, P.C.

By: 

PAULA J. WARMUTH

Attorney for Defendant,

Marjorie Most

2 Eighth Street

Farmingville, NY 11738

Telephone: 631-732-2000

Facsimile: 631-732-2662

Paula J. Warmuth

Email: pjw@stim-warmuth.com

Glenn P. Warmuth

Email: gpw@stim-warmuth.com

TO:

BAKER & HOSTETLER LLP
Attorneys for Plaintiff
David J. Sheehan, Esq.
email: dsheehan@bakerlaw.com
Marc E. Hirschfield, Esq.
email: mhirschfield@bakerlaw.com
Michael R. Matthias, Esq.
email: mmathias@bakerlaw.com
Karen Law, Esq.
email: klaw@bakerlaw.com

VERIFICATION

STATE OF FLORIDA)
) SS:
COUNTY OF PALM BEACH)

MARJORIE MOST, being duly sworn, deposes and says:

1. I am the defendant in this action.
2. I have read the foregoing responses to requests for admission and know the contents and the same are true to my own knowledge, except as to matters herein stated to be alleged upon information and belief, and as to those matters I believe it to be true.

Sworn to before me this

29 day of January, 2014


NOTARY PUBLIC


MARJORIE MOST



STIM & WARMUTH, P.C.
2 Eighth Street
Farmingville, NY 11738
Telephone: 631-732-2000
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Glenn P. Warmuth

Attorneys for Defendant

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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Adv. Proc. No.
10-04947 (SMB)

Plaintiff,

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MARJORIE MOST,

Defendant.

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CERTIFICATE OF SERVICE

most-134

PAULA J. WARMUTH does hereby affirm under the penalties of perjury:

I am not a party to this action. I am over the age of 21 years. I reside at 2 Eighth Street, Farmingville, New York. I am duly admitted to practice law in the State of New York and in the Southern District of New York. On January 31, 2014, I served the annexed defendant's response to request for admissions on:

Baker Hostetler LLP
c/o Michael R. Matthias
12100 Wilshire Boulevard
15th Floor
Los Angeles, CA 90025-7120

which address was designated by said attorney(s) or person(s), by depositing it enclosed in a postpaid properly addressed wrapper by first class mail [if excess of weight limit for first class mail, by priority mail] in the post office or official depository at Farmingville, New York State under the exclusive care and custody of the United States Postal Service.

Dated: Farmingville, NY
January 31, 2014

STIM & WARMUTH, P.C.

By: 

PAULA J. WARMUTH
Attorney for Defendant,
Marjorie Most
2 Eighth Street
Farmingville, NY 11738

Telephone: 631-732-2000
Facsimile: 631-732-2662
Paula J. Warmuth
Email: pjw@stim-warmuth.com
Glenn P. Warmuth
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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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(Substantively
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Defendant.

DEFENDANT'S RESPONSE TO REQUEST FOR
ADMISSIONS

STIM & WARMUTH, P.C.

Attorneys for Defendant, Marjorie Most
Office and Post Office Address
2 Eighth Street

Farmingville, New York 11738

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Plaintiff,

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MARJORIE MOST,

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DEFENDANT'S SUPPLEMENTAL RESPONSE TO REQUESTS FOR ADMISSION

The defendant, Marjorie Most, for her response to the requests for admission dated July 10, 2012 served by the plaintiff, states as follows:

Request No. 1. Admit that You received each of the Two year Transfer(s) set forth on Exhibit B to the Complaint, on each of the corresponding dates set forth on Exhibit B to the complaint, for BLMIS account number 1ZA781.

Response: Denies except admits that Marjorie Most received funds from her BLMIS brokerage account between December 11, 2006 and December 11, 2008 on or about the dates and in the amounts set forth in Exhibit B to the amended complaint.

Dated: Farmingville, NY
April / , 2014

STIM & WARMUTH, P.C.

By: 

PAULA J. WARMUTH
Attorney for Defendant,
Marjorie Most
2 Eighth Street
Farmingville, NY 11738
Telephone: 631-732-2000
Facsimile: 631-732-2662
Paula J. Warmuth
Email: pjw@stim-warmuth.com
Glenn P. Warmuth
Email: gpw@stim-warmuth.com

TO:

BAKER & HOSTETLER LLP
Attorneys for Plaintiff
David J. Sheehan, Esq.
email: dsheehan@bakerlaw.com
Marc E. Hirschfield, Esq.
email: mhirschfield@bakerlaw.com
Michael R. Matthias, Esq.
email: mmathias@bakerlaw.com
Karen Law, Esq.
email: klaw@bakerlaw.com

VERIFICATION

STATE OF FLORIDA)
) SS:
COUNTY OF PALM BEACH)


MARJORIE MOST, being duly sworn, deposes and says:

1. I am the defendant in this action.

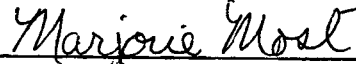
2. I have read the foregoing responses to requests for admission and know the contents and the same are true to my own knowledge, except as to matters herein stated to be alleged upon information and belief, and as to those matters I believe it to be true.

Sworn to before me this

1 day of April, 2014



NOTARY PUBLIC



MARJORIE MOST



STIM & WARMUTH, P.C.
2 Eighth Street
Farmingville, NY 11738
Telephone: 631-732-2000
Facsimile: 631-732-2662
Paula J. Warmuth
Glenn P. Warmuth

Attorneys for Defendant

UNITED STATES BANKRUPTCY COURT
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Defendant.

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CERTIFICATE OF SERVICE

PAULA J. WARMUTH does hereby affirm under the penalties of perjury:

I am not a party to this action. I am over the age of 21 years. I reside at 2 Eighth Street, Farmingville, New York. I am duly admitted to practice law in the State of New York and in the Southern District of New York. On April 4, 2014, I served the annexed defendant's supplemental response to request for admissions on:

Baker Hostetler LLP
c/o Michael R. Matthias
12100 Wilshire Boulevard
15th Floor
Los Angeles, CA 90025-7120

which address was designated by said attorney(s) or person(s), by depositing it enclosed in a postpaid properly addressed wrapper by first class mail [if excess of weight limit for first class mail, by priority mail] in the post office or official depository at Farmingville, New York State under the exclusive care and custody of the United States Postal Service.

Dated: Farmingville, NY
April 4, 2014

STIM & WARMUTH, P.C.

By: 

PAULA J. WARMUTH
Attorney for Defendant,
Marjorie Most
2 Eighth Street
Farmingville, NY 11738

Telephone: 631-732-2000
Facsimile: 631-732-2662
Paula J. Warmuth
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FOR ADMISSION

STIM & WARMUTH, P.C.

Attorneys for Defendant, Marjorie Most
Office and Post Office Address
2 Eighth Street

Farmingville, New York 11738

Phone: (631) 732-2000 Fax: (631) 732-2662
